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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RESIDENTS FOR SANE TRASH SOLUTIONS, INC., <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	12 Civ. 8456 (PAC)
	:	
UNITED STATES ARMY CORPS OF ENGINEERS, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	
-----	X	
NEW YORK STATE ASSEMBLY MEMBER MICAH Z.	:	
KELLNER, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	12 Civ. 8458 (PAC)
	:	
UNITED STATES ARMY CORPS OF ENGINEERS, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the administrative record submitted on June 14, 2013 and supplemented on September 27, 2013, and all prior pleadings and proceedings herein, defendants the United States Army Corps of Engineers and Colonel Paul E. Owen (collectively, "USACE"), by their attorney, Preet Bharara, United States Attorney for the Southern District of New York, shall move this Court, before the Honorable Paul

A. Crotty, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, for an order granting summary judgment on plaintiffs' claims against USACE.

Dated: New York, New York
October 28, 2013

PREET BHARARA
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